

Sam Page
County Executive



Beth Orwick
County Counselor

October 13, 2022

Jessie Steffan
906 Olive Street, Suite 1130
St. Louis, MO 63101

Re: *Keith Rose v. Robert Schulte.*; 4:22CV-00099 JMB

Dear Ms. Steffan:

On September 29, 2022, I accepted service on behalf of St. Louis County, Missouri, of your Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action. The date and time listed on the subpoena was incorrect. In an email exchange between us on October 3, 2022, we established that the deadline for documents to be produced would be October 13, 2022, at 5:00 pm.

On October 11, 2022, in another email exchange, I indicated that the October 15, 2022, deadline would be impossible to meet given how broad the scope of the search requested and the limitations of the County's electronic communication platform. That it would be unduly burdensome and unreasonable to comply with the request as constructed. You inquired as to the limitations of searching across custodians, and I responded in another email communication on October 12, 2022.

Additionally, in that October 11, 2022 email exchange, I explained that running a search of Mr. Rose's driver license across various law enforcement platforms would be problematic as it would create record, would not serve any law enforcement purpose, would be in contravention of user agreements, and could violate section 576.050 of the Missouri Revised Statutes. You disagreed with that position, and opted to review my impending motion to quash on the matter.

As of the date of this letter, I have not received any potential search terms or individuals to limit your request for electronic communications. A search was conducted of three individual mailboxes: Robert Schulte, Matthew Grimes, and Craig Molden. Utilizing the terms "Keith Rose" and "Traffic" for the period of November 18, 2018 to January 25, 2022, the search yielded zero (0) results.

I intend to file the motion to quash the subpoena, however I will cooperate with you in running searches with the terms and individuals relevant to the litigation. Thank you.

Sincerely,

/s/ Christopher D. Carter

Christopher D. Carter
Assistant County Counselor